

**F R A I M & F I O R E L L A**

A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW

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ALSO ADMITTED IN N.C.

June 30, 2022

**Via CM/ECF Filing**

Fernando Galindo, Clerk of Court  
United States District Court  
Eastern District of Virginia  
600 Granby St.  
Norfolk, VA 23510

Re: Case: United States v. Kevin Staton  
Case No.: 2:21-cr-141  
Sentencing: July 6, 2022

Dear Mr. Galindo,

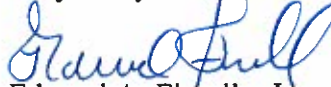
Enclosed please find the following documents, which I would ask be filed as supplements to the Defendant's Position on Sentencing:

1. Nine (9) Character Letters;
2. Norfolk State University Senior Year Grades; and
3. Five (5) Certificates of Training

Thank you for your courtesy and cooperation.

With best wishes, I remain

Very Truly Yours,

  
Edward A. Fiorella, Jr.

EAF/cjj

Enclosures

cc/enc: Graham Stolle, Esquire (*Via CM/ECF Notification*)

cc/enc: John F. Butler, Esquire (*Via CM/ECF Notification*)

cc: Kevin Staton

To The Honorable Judge Davis

My name is Kevin Staton Sr. and I was a single father raising Kevin and his four brothers and sisters. I was able to do this, even with the past mistakes I had made in my life, because of a strong support system that will also help Kevin and allow him to continue to flourish into the great man that he is and will continue to be.

Earlier in my life I made some bad decisions hanging with different people and received a felony drug charge. But because of my upbringing and strong support system I was able and determined to not let my past dictate my future. So I obtained a job, finished college, got custody of all my children and restored my rights. From there I went on to run my own business, purchase a home, work for the State of Virginia and now I'm working for the State of Texas as an Instructor at Texas State Technical College. All of this was because of a great support system including my family, true friends and a great church family at First Baptist South Hill, the same support system that is here for Kevin.

Kevin, his brothers and sisters were sheltered from a lot of things in life because I thought I was protecting them from the ways of my past and the evils of the streets, but sometimes that makes them not ready for certain situations in life. Kevin and his brothers and sisters were very active in the church where they participated in Boy Scouts, Girl Scouts, the choir and other activities. Kevin went on to excel in sports where, through hard work, he became one of the top linemen in the nation. Kevin had committed to San Diego State University but instead decided to stay home and play football where his father and brother both played, Norfolk State University. While at Norfolk State University, Kevin married his high school sweetheart Kassandra Staton, had two beautiful children, began working at Sentara Hospital and purchase a home for his family. Kevin obtained a Bachelors of Science in Nursing Administration and is currently working on his masters.

In life people make mistakes, the important thing is to learn and grow from them. I'm a strong believer in second chances and the Lord gave me just that and look at me now, productive in the community, helping to raise grandchildren and educating others. Yes, Kevin made a mistake but with his great support system, his positive influences and his will and determination to make things right for him and his family all Kevin needs is this second chance to show who he really is and who he is about to become. Your Honor I plead to you for this second chance so that he may maintain his great job in the field he loves and remain taking care of his family.

Respectfully,

Kevin Staton Sr.

To The Honorable Judge Davis,

I would first like to thank you for reading this letter. My name is Kaylah Staton I am Kevin Jr.'s oldest sister. Kevin is by far the most hard working and dedicated man I know; he has always been our "gentle giant". Kevin is an amazing father, husband, and provider to his family. Kevin is very family oriented; family is everything to him and Kevin has made so many sacrifices to ensure his family is taken care of. Kevin had a full ride scholarship to San Diego State University that he gave up to stay closer to his wife and first daughter. I remember he told me his dream is to become a pediatrician because he just loves children, and he couldn't wait to see what type of programs the college had to offer. My brother has always been the type of man to take care of his responsibilities before anything else. The situation he is facing now breaks my heart because I know for sure he was ignorant to the extent of crimes committed and under the impression he was going about things legally. This was a mistake your honor my nieces need their father I plead with you for the sake of those little girls and sister-in-law that you take this letter and those of our family and friends into consideration when sentencing. Thank you for your time.

Sincerely,

Kaylah Staton

June 26<sup>th</sup>, 2022

RE: Kevin Staton

To Whom It May Concern,

I am writing this on behalf of Kevin Staton. I had the pleasure of working with him at Sentara Norfolk General Hospital and was always impressed with his professionalism and hard work. In addition to his diligent work ethic, he is a graduate student, an athlete, and a family man.

Mr. Staton has always been a jovial character and productive member of society. I have never known him to participate in illegal activities of any sort and cannot imagine he would have done so on purpose. I believe it must be taken into consideration the recent change in federal laws along with the conflict in state versus federal laws concerning the sale of firearms. I am certain that there was no ill intent on the sale of his gun collection. In fact, as I understand it, he did so out of concern for his children and their safety in good faith.

Furthermore, Mr. Staton did not request that I write this letter. The positive impact that this young man exudes is such that I was contacted by an old coworker on his behalf. Of course, knowing Mr. Staton, I am more than happy to provide this simple letter on his behalf. It is my great hope that writing this simple letter regarding Mr. Staton and his charges in the sale of firearms will act as a positive and contributing factor when the court considers this matter.

Sincerely,

Zachary Soter

05/25/2022

### Character Letter

Dear Honorable Judge Davis,

My name is Bobby Price and firstly, I would like to thank you for taking the time to hear what I have to say about the type of man Kevin Staton is. I want to start off by saying that Kevin Staton is a great person. I met Kevin when I was 18 years old. We attended Norfolk State University together on football scholarships. Kevin brightened up every room he stepped in. Whether it was with humor or something as simple as him greeting you. And he's extremely smart! This might sound bad, but he used to help all the football players with our papers. He would revise them to make them sound grammatically correct and sometimes he would just write the whole paper. Kevin is also one of my first friends that became a father. I'm certain that's something he takes pride in and he's a great father! Honestly, that's all I've ever known Kevin to be. A good father who wants to take care of his family. As a friend, a teammate, and a brother, I know Kevin is harmless and wouldn't do anything to hurt anyone. When I heard about what happened, I knew immediately it couldn't be what it sounded like and it was something that must be taken the wrong way. I can honestly vouch as well as any of our other teammates and brothers, that for years Kevin's schedule was one of absolutely insane. He would wake up for early morning workouts, go to class, then practice, and then go to work right after practice, then after working all night still somehow have the energy to come back to do homework and help whoever needed help with their work. We often called him, "Old man Staton" because of the load he had on his back and how well he handled and juggled everything going on. Like an old man whose been used to handling stress and doesn't complain, just gets things done. Even after I signed with the Detroit Lions, I still ask Kevin for advice and check up on how him and the

05/25/2022

family is doing. He is the first person I have ever actually met that chose to chase his career job over a chance to go to the NFL. I always thought that out of anyone, Kevin would be the one here in the NFL with me. Even though he could have just stayed with football and still been able to take care of his family. He used to always say that you need a backup plan and that football wont last forever. He always seemed to have a better grip on reality than most 19/20 year old. All anyone knows him for is just working hard. Even though I am getting ready for the upcoming season and have a lot going on in my life. I felt as if this was absolutely necessary. I know that his heart was completely broken when he heard he was in trouble. All he ever talked about at practice was his little girl and how he loved his wife, at only about 19 years old. Kevin's impacted not only my life but the community entirely. I talked to him when he asked me to write this letter. And he told me how blessed he still was in the middle of his storm. And as I was listening, he told me how long he's been dealing with this whole situation. And all I could say was that God blessed him with the heart of a saint. He talked about how since this situation started, he graduated and working on his masters, bought a house in a little suburban neighborhood, got promotions through his job, and some other things. And all I could tell him was that he was touched by the hand of God. Kevin honestly tried his best to put himself in a situation to make sure he was doing things legally. And as I conclude this letter, I just ask you to truly look at the character of a man by his actions, not by the ignorance of a dumb mistake. There are very few good people, especially in our young generation. And I can whole heartedly say, that Kevin Staton is one of them.

Sincerely,

*Bobby Price #27*

*Detroit Lions*

Tavante Beckett

06/07/2022

Kevin Staton Character Letter

Dear Honorable Judge Davis,

I met Kevin Staton in high school around freshman year. We didn't go to the same school, but it was hard not to hear about a 6 foot 5, 280-pound freshman. When you first look at Kevin he looks a little scary or intimidating, but once he starts talking you realize that this guy is a giant teddy bear who wouldn't hurt a fly. A lot of people used to pick on Kevin, mainly because he would let them and wouldn't do anything about it. Kevin doesn't like confrontation and to be the bad guy and sometimes that gets him into trouble. As we got older together and started hanging out more because his mom moved into my neighborhood. I saw Kevin come into his own. I saw someone who would get picked on because of who he is and how he talked and how he acted like a goody two shoes. I saw him turn into someone that everyone wanted to be around and talk to and hang out with because of the simple fact that he never changed. I think as kids, we often pick on and make fun of others who doesn't fit the certain "cool" image. And it's not until we get older that we realize that it's cool to be yourself regardless of what others say, and that was Kevin. Kevin was always at church or watching his brothers and sisters or working, so he never really went to too many of the parties or anything. I remember Junior or Senior year when we finally went to Indian River High School together, how he would always tell people that he was going to be a doctor. People laughed, including myself in a joking way, that he would be the doctor over at the jail holding down the inmates to give them their shots. Of course, he didn't take it to heart and just laughed it off with everyone else. And then when he got a scholarship to San Diego State University he committed right away because they had a Top10 nursing school in the country at the time. A lot of people knew he could go higher but he didn't care what anyone said and did what he wanted to do to set himself up in the future. Then when he de-committed and decided to go to Norfolk State to stay close to his little brother with Autism and take care of his dad, a lot of people said crazy things to him. But he drowned them out and kept his head down and did what he had to do for himself, regardless of what others may think. One night I was in the car with my mom going home and I saw Kevin on the curb of the street crying. When I came to ask him what was wrong, he told me he didn't understand why everything was so hard. He said, "How come I have to work so hard, when I do everything right". He told me "I'm tired of always being the nice guy, I'm tired of working hard, I'm tired of putting everyone before myself and always being the only one hurt." And that was the first time I saw a broken Kevin. I felt like the world finally broke one of the last genuine people left. I told him that if he just holds on that everything would get better, which is always better said than done. He wiped his tears and then smiled and said, "I'm good, I'm just tripping". But I knew he was lying. The next day, it was like nothing ever happened. That is who Kevin is, he carries the load most of us would be crushed under. From 13 years old to now, he always did his best to put others before himself. He said it's just the way he was raised. Even after I got signed a NFL contract with the Lions, I met Bobby Price. He was Kevin's teammate at Norfolk State and one of the things we would always talk about is how Kevin lives the life of an old man. But that is

what he said he always wanted. Getting married, graduating college and working to become a doctor, quitting football to start a career, buying apartments and a house, buying cars all before 22/23. He said what he was going to do and it was known Kevin would get picked on about it because people like us and where we're from don't do that. But he did, and he did it the right way. I know he made a mistake, but I'm positive he thought he was probably doing everything right. I honestly don't even think Kevin would survive being with real criminals, simply because of who he is and how he is. He's too nice, talks too much, a people pleaser, wants everyone to be his friend, has ZERO street smarts, sees the good in everyone even when you shouldn't. He wears his emotions on his sleeve and tries to help people too much even if he doesn't want to. Kevin's character is never a question. And even after I signed my NFL contract, I always checked on Kevin to make sure he was doing good, and he was always positive and talking about his promotions at work and things. It's truly sad that someone like Kevin is in this situation. But I am 1000% positive Kevin had no ill intention and did whatever he needed to try to make it right. Because that is who he is.

Sincerely,

*Tavante Beckett*

*Detroit Lions #59*



**Kevin Staton Character Letter**

**Dear Honorable Judge Davis,**

My name is Jalen Powell, and I have known about Kevin since I was in high school, way before actually meeting and playing with him at Norfolk State University. I knew about Kevin in high school because he was one of the highest recruited Offensive Lineman in the State and was committed to play football at my favorite college, San Diego State University. It shocked a lot of people when Kevin decided to stay home and go to Norfolk State University. I would later find out after accepting a scholarship to NSU that Kevin passed up playing at a better school in California in order to take care of his family. This was one of the first glimpses into seeing who Kevin Staton really was. Years have passed and I can honestly say that there is no person more reliable and caring than Kevin. When I didn't know what to major in when I got to NSU, Kevin told me about how much he loves to help people and planned on getting his degree in Healthcare Services and then finishing his B.S. in Nursing before pursuing to become a doctor. And after talking to him, I decided to do the same thing and pursued the same exact degree that he did. Me and a lot of younger guys look to Kevin for advice when it comes to important life aspects. When we see Kevin, we see how he got married at a young age, works a career job, has 2 kids, a wife, and just bought a house. And we can't help but to be in awe, because despite his situation as a kid he never made excuses and just kept his head down and worked hard. My first 2 years at NSU I witnessed Kevin going from early morning workouts, to class, to practice, then go to work at McDonalds. This was a guy that is on SCHOLARSHIP with everything being paid for, not having to worry about anything. Going straight from practice to work at McDonalds. And when he wasn't working Kevin was helping kids like me study our courses. And since I chose the same Degree as Kevin, I can honestly say I probably wouldn't have graduated this year if it wasn't for his help. I just graduated 2 weeks from writing this letter and can honestly say that I would not have gotten my Bachelors without the help of Kevin Staton. He has mentored me in so much about life to become a better man. He always checks up on me to make sure that I'm doing what I'm supposed to do and tried his best to get me what I need even though he has his own family to worry about.

Kevin was there during the worst time of my life. In broad day light while I was getting out of my car in Norfolk, a man ran up to me and put a gun to my head. At the time, I was on the phone with another teammate and yelled for help before getting shot in the head. As I was rushed to the hospital, the first person's name I asked for was Kevin's because I knew that he worked at there. Kevin never left my side one day. He stayed with me every day during his lunch break and even brought my video game to the hospital so that I wouldn't be bored. I remember the hug he gave me when he first saw me and the tears on my shoulder as if I was his son. Kevin cared about all

of the young kids on the team and was always there for us when we needed him. Below is a picture I took of Kevin, a little before being released from the hospital. In the picture, Kevin stayed long after clocking out of work just to make sure that I was doing ok and had company. After getting shot in the face I was positive my football career was over and wanted to get a jump start on my career, and Kevin took the time to introduce me to his boss Tahirah. Kevin even asked her right then and there if I could get a job and that I was a good student and would work just like him. I was shocked at how bold he was, but that is just who he is. Kevin would do anything to help someone become a better version of themselves. And even though I wanted to give up football, Kevin kept pestering me to think long and hard and that God has a plan for everyone. And it is because of him that I decided to give football a try one more time. And since then, I have become an HBCU All- American and NFL, XFL, and CFL prospect.

I can honestly write a paper on how much of a blessing Kevin has been in my life and the people around him. I remember when he got the job offer to work at Sentara and he was telling me and a group of friends that he was thinking about quitting football to get started on his career and start "climbing the corporate ladder" like he used to say. And we all thought that he was crazy. And tried to tell him that if he just stuck it out with football that they would be taken care of when he signs a NFL contract or wherever he goes. But Kevin being who he is, started talking about the chances of that big contract and how he wanted to graduate and eventually become a doctor and do something nobody in his family has done. But we just laughed about how a 6-foot 7 big black nurse would scare the patients. But he didn't care what anyone had to say, and he worked his butt off in school and at work and achieved everything that he told us he would. At only 22/23, while most people are still living with their parents trying to figure out what to do with their lives. Kevin at 19 years old had a vision that he shared with the world, and that was to help people in Healthcare. And even though we may have laughed at first, we were still rooting for him and amazed but not surprised when he got everything he said that he would. I didn't know how to feel when he quit football to chase a career job when we were pretty much kids almost, only like 18/19. But Kevin said he saw something bigger than football and he beat the odds.

I can speak for a large number of us, when I say that Kevin Staton is the most God-driven and family devoted person you can hope to meet. Like I said before, I can honestly write a book on how much of an impact Kevin has not just made in my life but in the community as a whole. I pray that this letter helps show you that Kevin deserves to be home with his wife and kids. I plan to be right by his side just like he was mine every step of the way. We all make mistakes, but that does not define who we are. WE are defined by our actions and character. And I think that Kevin's character shows who he truly is. Thank you for taking the time to read my letter.

Sincerely,

Jalen Powell





ONE OF THE CHESAPEAKE PUBLIC SCHOOLS

**GREAT BRIDGE HIGH SCHOOL**  
301 HANBURY ROAD WEST • CHESAPEAKE, VA 23322  
(757) 482-5191 • FAX (757) 482-5559

**To:** Whom It May Concern

April 26, 2022

**From:** Senior Master Sergeant Patrick M. Smith, USAF (Ret)

**Subject:** Character Letter

**For:** Kevin Staton

It is my distinct honor to submit this character letter on behalf of Kevin Staton. I have known Kevin for the past nine years as he was a member of the Great Bridge High School, Air Force Junior Reserve Officer Training Corps (AF-JROTC), and I have advised and encouraged him since.

Kevin distinguished himself above his peers where he displayed un-paralleled integrity and trust on numerous occasions doing the right thing when nobody was watching. Kevin overcame a negative stigma of teachers fearing Kevin because of his size. Kevin proved to be a gentle giant displaying proper respect and discipline to all teachers. Within the JROTC program, Kevin earned several best uniform and best shoe awards for the weekly uniform inspections.

Kevin was taught by Major Kevin Gore and myself to be above reproach in business and always keep your documentation. Kevin was taught to be responsible for your family and be the man who provides for his family. I witnessed Kevin work on and improve his conflict resolution and leadership skills earning respect from his peers and school leadership. Kevin improved on and off the field and went to college and completed college defying the odds for young black men from his community. Kevin has a wife, who also participated in the AF-JROTC program; and children depending on him while he currently pursues a master's degree.

Without any hesitation I can sign my name to this letter knowing Kevin has always followed the rules and is the epitome of character. I plead with whomever reads this letter to see there must have been an honest mistake and Kevin would not have kept documents creating a paper trail if malice or deceit was intended. Please have mercy and think about what this young man has accomplished as an entrepreneur and did not sit back depending on the system to support his family.

Should you need more information or have questions, please feel free to reach me at [Patrick.smith@cpschools.com](mailto:Patrick.smith@cpschools.com), or 757-327-1561.

Patrick M. Smith, SMSgt, USAF (ret)  
Aerospace Science Instructor, GBHS

Marquise Taylor

**Kevin Staton Jr. Character Letter**

Dear Honorable Judge Davis,

I am writing this letter on behalf of one of the most influential people that I know, Kevin Staton. Me and Kevin both grew up together and I had the pleasure of going to Middle School, High School, and even attend NSU together. Kevin has been an inspiration to me for years and continues to be to this day. And since knowing Mr. Staton I can honestly say that there is no person more of a "family man" as Kevin Staton. I was there when he turned down multiple Division 1 scholarships from across the country to stay home and play at NSU to help his little brother with Autism and dad with Cancer. I was also there when everyone laughed when he got married as a teenager. And I remember what everyone said when he said that he didn't care about football and just wanted to help people and become a nurse, then a Doctor. And through it all, Kevin stayed his course and never once paid attention to what anyone else was saying. And watching him accomplish everything that he set out to acquire was not only an inspiration to me, but everyone in the community. Kevin's accomplished so much at such a young age it's truly crazy to witness. When you first see him, he can be a bit intimidating standing at 6'7, 300+ pounds. But once you start talking to him you realize that he is one of the nicest people you'll ever meet. Kevin doesn't think twice to go out of his way to help someone in need and always tries to do the right thing. I can honestly say that Kevin is an inspiration to me and all of the mutual people that we know. I saw the doubts of people turn into praise when Kevin started reaching all of the goals that he set out for himself. The same people that made jokes began asking for advice and he soon became an inspiration to the whole community. I recently just had my own daughter and hope that I can be half of the family man that Mr. Staton is. He pushes me

to be better and occasionally checks in on how things are going if we are not playing video games together. Kevin is who I believe every true young man should aspire to be. And I know what he faces but can whole-heartly say that a man of his stature and character does not belong locked away with actual criminals. Yes, he made a big mistake due to his negligence. But as soon as he was confronted about it, he tried everything in his power to fix what he could and show the type of person he is. This speaks volumes about his character. I remember the phone call of him crying and just apologizing for his negligent actions and asking for me not to change how I view him. For the first time, I saw Kevin completely broken and it hurt to see a grown man cry to his friends to not change how they view him for a mistake. Kevin is a true inspiration to me and the people that know him. He is an amazing Father, Husband, Employee, Student, Athlete, Friend, and Mentor. We as a community, are praying and begging that Kevin stays home to continue being the man and future Doctor we know he will be.

Sincerely,

Marquise Taylor

Noland Armstrong  
U.S. NAVY CWO2

Kevin A. Staton Jr. Character Letter

**Hello Honorable Judge Davis,**

I am writing this letter in regard to Kevin A. Staton Jr. someone who truly embodies what it means to be an upright citizen and man of his own accord. Kevin Jr has a drive that is rare in young people these days and pushes to inspire everyone around him. At only 23 years of age, Kevin Jr. is married and has 2 beautiful little girls, he has been a 2 time All-American in football, graduated with a Bachelors of Science in Healthcare, and acquired millions of dollars in academic scholarships from schools across the country, working on his Master's right now and only has to finish his clinicals before acquiring his BSN (Bachelor's of Science in Nursing), after which he thrives to get his Doctorate Degree in Health Science so that he can become a Doctor. Kevin balanced working at first McDonalds before being hired to work full-time at Sentara Norfolk General Hospital at 18/19, while still being a full-time student, full-time athlete on scholarship, full-time father, and full-time husband. Kevin carried the load to become something better with the limited resources for himself and for his family. Kevin is the type of person where his resume speaks for itself, and obviously his mistake was out of inattention and misunderstanding. I am proud to be his Uncle and life mentor and am excited for what the future holds for this young man. Since first dealing with the current situation/charges, Kevin has been more focused than ever to put himself and his family in the best position no matter what happens. In such a small-time frame since the beginning of this investigation/charges 2 years ago. Kevin has graduated from NSU with a Bachelors of Science in Healthcare, got accepted into the Western Governors University Master's Program, had a beautiful baby girl, and accepted a new

job offer and position in Sentara. This young man is truly what I believe the most ideal and upright citizen, son, nephew, father, husband, Boy Scout, Christian, student, athlete, friend, and mentor should be. I pray that you will see Kevin for who he truly is. And see that taking him away from this community and family would do more harm than good. He has not only been a blessing in my life but everyone around him. Thank you for taking the time to see what I had to say about my nephew Kevin Staton Jr., and I hope that you take this into account when deciding what would be appropriate for someone with as much promise and potential as my nephew.

**Sincerely,**

***Noland Armstrong,  
U.S. Navy CWO2***





**NORFOLK STATE  
UNIVERSITY**

Stalon, Kevin A. ▼ | ?

Menu

★ FOLLOW



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Notifications

Term GPA 3.220

Course Section	Title	Grd 1	Grd 2	Grd 3	Grd 4	Grd 5	Grd 6	Final Grd	Credits	CEUs
ECN-212-91	Intro to Macroeconomics	B	B					B-	3.00	
MUS-234-30	Afro-American Music	C+	B+					A	3.00	
HSM-497-90A	Problems and Research	A	A-					A-	3.00	
HRP-320-91	African Amer Health	B-	B-					B	3.00	
ECN-211-02	Intro to Microeconomics	C+	C					B-	3.00	





# **Certificate of Completion**

This certifies that

**Kevin Staton**

has successfully completed

**Social Engineering**

as of 07-15-2019



# **Certificate of Completion**

This certifies that

**Kevin Staton**

has successfully completed

**Annual Regulatory - IT Security**

as of 03-31-2020



# **Certificate of Completion**

This certifies that

**Kevin Staton**

has successfully completed

**Deposit Collections**

as of 07-10-2018



# **Certificate of Completion**

This certifies that

**Kevin Staton**

has successfully completed

**Patient Rights and Responsibilities**

as of 07-05-2018



# **Certificate of Completion**

This certifies that

**Kevin Staton**

has successfully completed

**Revenue Cycle Training - Registration**

as of 07-06-2018

Signed: Frankie Conrod